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June 30, 2025

BY ECF

—ATTORNEY AT LAW—

He/him/his

Hon. Lewis J. Liman United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

> Derwin Gonzalez v. City of New York, et al., 25 CV 1452 (LJL) Re:

Your Honor:

I am co-counsel for Plaintiff in the above matter.

I write to ask that the Court extend the June 30, 2025 deadline by which Plaintiff is to file any amended pleadings by two weeks, to July 14, 2025. Defendants consent to this request. There has been no prior application to extend this deadline.

Plaintiff intends to amend the operative pleading, including to substitute in the true names of the four "Doe" Defendants, which Plaintiff has recently learned. Defendants do not consent to the proposed amendments Plaintiff has proposed. However, the parties have not yet met and conferred in order to determine whether we can come to an agreement. If the Court grants the requested two-week adjournment, we will be able to meet and confer, and Plaintiff will either file an amended pleading on consent, if possible, or make a further application related to amendment. If the Court denies the application for a two-week extension, Plaintiff respectfully asks that the Court grant an extension to a date the Court deems reasonable.

Plaintiff and Plaintiff's counsel thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver